

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

IN RE: *

DENISE E. SAMPLE *

Debtors

* * * * *

CASE NO. 09-33132
Chapter 7

DENISE E. SAMPLE. *

Movant *

vs. *

UNIFUND CCR PARTNERS LLC *

Respondent *

MOTION TO AVOID JUDICIAL LIEN
IMPAIRING DEBTOR'S EXEMPTION

DENISE E. SAMPLE, by Arthur L. Rhoads, Jr., her attorney, hereby files this Motion to Avoid a Judicial Lien Impairing Debtor's Exemptions under 11 U.S.C. Section 522 and for reasons state:

1. The movant, Denise E. Sample, is the debtor in the above entitled case under Chapter 7 of the Bankruptcy Code pending in this Court.

2. That Respondent, UNIFUND CCR PARTNERS LLC has a Judicial lien with an approximate balance in the sum of \$9000.00 on the following described real property of the Debtor, namely, **1814 W. Franklin Street, Baltimore City, Maryland**

3. Such lien resulted from a judgment obtained in the District Court of Maryland for Baltimore City in case No. 0019894-2008.

4. Said property is of a kind described in 11 USC Sec 522 on which the debtor is entitled to have the lien of respondent avoided pursuant to said section of the Code to the extent that it impairs the exemption debtor took on Amended Schedule C in the sum of

\$3360.00.

WHEREFORE, Debtor prays for relief as follows:

1. That the lien/security interest described above be avoided in the sum of \$3360.00; and

2. For such other and further relief as the nature of her cause may require.

/s/ ARTHUR L. RHOADS, JR.

ARTHUR L. RHOADS, JR.

704 Frederick Road

Baltimore, MD 21228

phone 410 788 5700

Attorney for Debtor

Federal Bar No. 08654

DATED: 03/11/10

I HEREBY CERTIFY that on this 11th day of March, 2010 I mailed by first class mail, postage prepaid, a copy of the foregoing motion and order to:

Monique D. Almy, Trustee
Crowell & Moring
1001 Pennsylvania Avenue NW 10th FL
Washington DC 20004-2595

Office of the U. S. Trustee
101 W. Lombard St. Ste 2650
Baltimore, MD 21201

Unifund CCR Partners LLC
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Denise E. Sample
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/s/ ARTHUR L. RHOADS, JR.

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